

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

Judith L. Jones
25 Sheridan Street, NW
Washington, DC 20011
Plaintiff

Case No. _____

VS.

Montgomery County Public Schools (MCPS)
Board of Education (BOE)
Interim Superintendent of MCPS
850 Hungerford Drive
Rockville, Maryland 20850
Defendant

FILED _____ ENTERED _____
LODGED _____ RECEIVED _____

MAY 12 2022

AT BALTIMORE
CLERK U.S. DISTRICT COURT
DISTRICT OF MARYLAND
BY _____ DEPUTY

COMPLAINT

1. Jurisdiction in this case is based on:

Diversity (none of the defendants are residents of the state where plaintiff is a resident)

Federal question (suit is based upon a federal statute or provision of the United States Constitution)

Other (explain) **MCPS BOE failed to properly notify plaintiff of a hearing regarding her employment. Plaintiff contacted MCPS consistently during the same time period regarding her assigned school.**

Gross negligence/mismanagement of tenure, pay and certification files that diminished ability to retire from Maryland State Department of Education (MSDE). Repeatedly failed to verify employment to potential employers.

Complaint (Rev. 12/2000) 2

2. **The facts of this case are: Plaintiff has made several attempts to mediate her situation using the courts as well as contacting MCPS BOE requesting a hearing about the matter**
3. **Met with Human Resources (HR) Director and Employee Retirement Services Center (ERSC) via zoom to discuss my HR, certification and pay status as an employee with MCPS. Sent information that affected my tenure.**
4. **Despite repeated attempts to continue discussions, MCPS BOE has not responded.**

Complaint (Rev. 12/2000)

3. The relief I want the court to order is:

Plaintiff requests mediation protocols available through the court with MCPS BOE at the least so Plaintiff can retire from MSDE and discuss remedies. Please see attached remedies and Plaintiff statement.


Damages in the amount of:

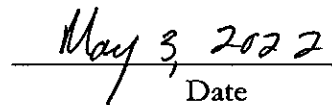
An injunction ordering:

Other (explain)

Relief Requested

- ❖ Rescind termination and allow Plaintiff to retire from Maryland State Retirement System as an MCPS employee with full benefits in the previous Maryland State Retirement system in effect when Plaintiff was hired in 1997 as a curriculum writer.
- ❖ Writing credits for curriculum development of computer applications, business math, accounting and other business courses for distance learning
- ❖ Letters of employment confirmation and recommendation for all applicable certification areas including Computer Science and Computer Applications
- ❖ MCPS recommend certifications to MSDE on behalf of Plaintiff for Advanced Professional Certificate (renewal), Computer Science and Computer Applications, and Business (renewal)
- ❖ Retire with 40 years on full disability with full benefits
- ❖ Refund from Union Defendants dues deducted from pay for Plaintiff's entire tenure
- ❖ MCPS and Union Defendants reimburse and pay for Plaintiff having to seek legal counsel to relieve MCPS/Union Defendants detriment during tenure with MCPS
- ❖ MCPS/Union Defendants pay for all fees and expenses for bringing this lawsuit
- ❖ Reinstate membership in the previous retirement system
- ❖ At Wootton HS, a yearbook picture of Sister Raising the Standard with Plaintiff as the Sponsor (2006-2007)
- ❖ Nine+ years back pay at MA+ 60 salary group at the highest possible step
- ❖ Bonuses and merit pay for teaching at disadvantaged schools and programs as Highly Qualified teacher with APC
- ❖ Frozen salary back pay - Repayment of "Class II certification penalties" deductions
- ❖ Payment for Missed step 19 bonus
- ❖ Repayment for 8 months of pay deductions for health benefits during approved sabbatical
- ❖ Return Mismanaged 403b contributions with proposed interest payments
- ❖ Repayment of random pay deductions
- ❖ Bonus and merit pay for diminished opportunities without CS certification, acknowledgement of Masters degree credits and "highly qualified" designation by MSDE for any years without certification
- ❖ Pain and suffering for enduring harassment, coercion, intentional infliction of emotional distress, retaliation and defamation of character for PARs, involuntary transfers, Administrative (school and central admin) detriment without recognition of a 'Veteran, Highly Qualified' Teacher as a protected class within MCPS.


Signature


Date